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The RDA Steering Committee (RSC) read with interest the August 2, 2019 document "PCC's Position Statement on RDA" and in the spirit of cooperation and clarity offer the following comments.

The primary message that came from our reading of this document is that future PCC standards would be set—as they are now—through selecting and combining metadata elements from a variety of standards and sources. While we don't completely understand the meaning of treating RDA as "loose content standard," we would simply point out that this approach is largely compatible with RDA, which provides for a wide range of choices of elements, levels of granularity, and ways to record data values, all of which are acceptable. For example, the options to use transcribed text, or a structured access point, or an identifier like an ISNI, or an IRI are all valid approaches under RDA. The RSC has taken great pains to make RDA broad, flexible, and forward-looking. This is even more true with the beta Toolkit. We believe that some of the concerns raised in the Position Statement conflate existing PCC/NACO applications of RDA with the RDA instructions themselves.

Like the PCC, the RSC has felt a responsibility to provide transition mechanisms in RDA from legacy practices (such as the formulation of authorized access points) to methods that will be less labor-intensive for cataloguers and more machine-reliant (such as identity management). As you know, RDA is an ontology as well as a content standard, and perhaps this is what you mean when you refer to RDA/RDF. The RDA ontology is aligned with the IFLA Library Reference Model and is represented in RDF using RDFS, SKOS, and OWL with best practice guidelines as part of the RDA Vocabularies. RDA Vocabularies is published in GitHub with semantic version control and under an open license to encourage the development of applications and services using RDA data. The RDA Registry provides an interface for finding and downloading specific RDA element sets and value vocabularies as well as RDF maps to related standards such as Dublin Core, ISBD, and MARC 21. The Registry also offers a de-referencing service for RDA URIs. The beta RDA Toolkit is dependent on the RDA ontology for a significant portion of its content and structure, and is therefore a 'recommended site' for assessing the utility of the RDA ontology.

The Position Statement cites the Dec. 2018 letter from the European BIBFRAME Workshop to the RSC, and concludes the paragraph with "The PCC will also invest in making or finding points

of linkage so that two parallel practices are connected..." A process for identifying those points of linkage is already underway. The RSC began a conversation with members of the larger BIBFRAME community at the 2019 ALA Annual Conference in Washington, DC to discuss the relationship and interoperability between RDA and BIBFRAME. The RSC stands ready to begin mapping to BIBFRAME as soon as BIBFRAME is stable enough to do so. We hope this will minimize the PCC's need to invest in this area of exploration.

The RSC, too, has considered the BSR and CSR as incipient RDA application profiles, and hope that you will continue to develop these documents for use with the beta Toolkit. We continue to work toward seamless integration of application profiles with Toolkit content for the ease of use of our users.

In several places in the Position Statement, it is stated that RDA may not be able to meet PCC's needs. The RSC would be very interested to learn about areas where RDA should be further developed, particularly areas where metadata is captured now but not addressed at all by RDA. We welcome the opportunity to work with you to identify and fill gaps and to resolve any perceived incompatibilities.

Implementing a new data model (LRM) and new encoding practices (RDF/linked data) are significant challenges for our profession, and the RSC respects the work of the PCC in providing leadership in moving ahead. We are available and look forward to opportunities to continue to work together and to consult as needed.

Sincerely,

Kathy Glennan, RSC Chair, on behalf of the RDA Steering Committee